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12 JUN 1986

Diamond Shamrock Site Compliance Audit Funding - Priority One Request

Basil G. Constantelos, Director
Waste Management Division

William H. Sanders III, Director
Environmental Services Division

Diamond Shamrock Corporation and U.S. EPA entered into an Administrative Consent Order (CO) on July 14, 1983 concerning the activities to be conducted to remediate any significant pollution attributed to the Diamond Shamrock site in Painesville, Ohio. The CO mandates collection of surface water and groundwater samples to detect any elevated concentrations of pH, total and/or hexavalent chromium. We are planning on conducting an oversight investigation to assure compliance with the CO at this site and would like to utilize your services in this investigation.

The site is a 100 acre tract of real property located on the Grand River in Painesville, Ohio. Diamond operated a chromium chemicals plant on-site between 1931 and 1972 generating 750,000 tons of chromate wastes, which was disposed of at the site in waste lagoons and waste piles. A thin clay/flyash cap was installed over the entire site followed by several inches of topsoil which was seeded.

There are active leachate streams on-site breaching a dike and cap. Chromate wastes, trivalent and hexavalent, have migrated all over the entire site and leached into the Grand River and into the groundwater.

A site specific Grand River Monitoring Program, outlined in the CO, is designed to investigate the impact of the Diamond Shamrock site run-off and groundwater infiltration to the Grand River as related to total chromium, hexavalent chromium, and pH contamination. This survey is designed to document the proper water sampling collection procedures and chemical analysis of collected chromium and pH samples following the monitoring program outlined in the Consent Order. If there are facts that show the site has in fact violated background levels for chromium, a remedial action plan as specified in the CO, will be required of Diamond Shamrock.

We are requesting that the Eastern District Office (EDO) provide: 1) laboratory analyses for approximately 50 hexavalent chromium samples, 2) a pH meter and a set of 3 buffer solutions, 3) a field service person to assist in split sample collection, deliveries, and documentations of actions taken by Diamond Shamrock personnel.

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The survey will be conducted on June 17, 18, and 19, 1986 and will include oversight of Diamond Shamrock personnel in their collection and analyses of groundwater and surface water samples. We will split samples and oversee their work on this investigation for all 3 days.

The CERCLA Decision Unit for this project is Y306. In addition, if you have any questions, please contact the project manager, Daniel Bicknell at (312) 886-7341.

Thank you for your considerations.

cc: A. Richard Winklhofer - EDO

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